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12 *Attorneys for the Ad Hoc Committee of*  
13 *Holders of Trade Claims*

14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 **In re:**  
18 **PG&E CORPORATION**  
19 **-and-**  
20 **PACIFIC GAS & ELECTRIC COMPANY,**  
21 **Debtors.**

- 22 ☐ Affects PG&E Corporation  
23 ☐ Affects Pacific Gas and Electric Company  
24 ☒ Affects both Debtors

25 *\*All papers shall be filed in the Lead Case, No.*  
26 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**NOTICE OF APPEARANCE AND  
REQUEST FOR SPECIAL NOTICE**

**PLEASE TAKE NOTICE** that the Ad Hoc Committee of Holders of Trade Claims (the “Ad Hoc Trade Committee”), a party in interest in the above-captioned bankruptcy cases (the “Bankruptcy Cases”), by and through its counsel, Gibson, Dunn & Crutcher LLP, hereby enters this appearance pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Rule 9010-1 of the Bankruptcy Local Rules for the Northern District of California, and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and requests that the counsel listed below be added to the official mailing matrix, CM/ECF, and service lists in the Bankruptcy Cases. The Ad Hoc Trade Committee requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in the Bankruptcy Cases and copies of all papers served or required to be served in the Bankruptcy Cases, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, and all other matters arising herein or in any way related to the Bankruptcy Cases, including in adversary proceedings, be given and served upon Gibson, Dunn & Crutcher LLP at the following addresses:

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**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request applies to and includes not only the notices and papers referenced in the Bankruptcy Rules and Bankruptcy Code, but also includes, without limitation, all orders, notices and pleadings relating to any application, motion, petition, objection, pleading, request, complaint or

1 demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed  
2 by mail, telephone, courier services, hand delivery, facsimile transmission, electronic mail, telex or  
3 otherwise that (i) affects, or seeks to affect, or may potentially affect in any way, any rights or  
4 interests of any creditor or party-in-interest in these Bankruptcy Cases; (ii) affects, or seeks to affect  
5 (a) the above-captioned Debtors and/or their estates or (b) property or proceeds thereof in the  
6 possession, custody, or control of others that any of the Debtors or their estates may seek to use; or  
7 (iii) requires or seeks to require any act, delivery of any property, payment or other conduct by the  
8 Ad Hoc Trade Committee.

9 **PLEASE TAKE FURTHER NOTICE** that the Ad Hoc Trade Committee does not, by filing  
10 this Notice of Appearance and Request for Service nor any subsequent appearance, pleading, claim or  
11 suit, waive or otherwise impair any of its rights: (i) to have final orders in non-core matters entered  
12 only after de novo review by a District Court Judge; (ii) to have all core matters heard and decided by  
13 a District Court Judge; (iii) to trial by jury in any proceeding so triable in these cases, or any  
14 controversy or proceeding related to these cases; (iv) to have the District Court withdraw the  
15 reference in any matter subject to mandatory or discretionary withdrawal; or (v) any other rights,  
16 claims, actions, defenses, setoffs or recoupments to which the Ad Hoc Trade Committee is or may be  
17 entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments the  
18 Ad Hoc Trade Committee expressly reserves.

19  
20 Dated: October 10, 2019

**GIBSON, DUNN & CRUTCHER LLP**

21  
22 By: /s/ Michael S. Neumeister  
23 David M. Feldman\*  
24 Matthew K. Kelsey\*  
25 Matthew D. McGill\*  
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*\*pro hac vice applications pending*

27 *Attorneys for the Ad Hoc Committee of*  
28 *Holders of Trade Claims*

1 **CERTIFICATE OF SERVICE**

2 I, Duke Amponsah, declare:

3 1. I am over the age of 18 years and not a party to this action. My business address is  
4 Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166-0193, which is located in  
5 the country where the service described below occurred.

6 2. I hereby certify that on October 10, 2019, I electronically filed the above Notice of  
7 Appearance and Request for Special Notice with the Clerk of the Court using the CM/ECF system,  
8 which will send notification of such filing to e-mail addresses on file with the Court's ECF system.

9 I certify and declare under penalty of perjury that the foregoing is true and correct.

10  
11 Duke Amponsah  
(type)

/s/Duke Amponsah  
(signature)